

REMARKS

The indication of allowable subject matter in claims 5 and 8 is acknowledged and appreciated. In view of the following remarks, it is respectfully submitted that all claims are in condition for allowance.

Claims 1, 9, and 12 are independent and stand rejected under 35 U.S.C. § 102 as being anticipated by Kanade et al. '083 ("Kanade"). This rejection is respectfully traversed for the following reasons.

The Examiner again relies on col. 6, lines 5-33 of Kanade as allegedly disclosing the claimed synchronized data in relation to the disclosed "genlock signal" of Kanade. However, as previously mentioned, the disclosed "genlock signal" merely effects the shutter for each camera 18 to fire at precisely the same time (col. 6, lines 29-32). Kanade is completely silent as to a synchronization *pattern* for establishing *frame* synchronization. One exemplary embodiment of such a signal can be, for example, a unique bit pattern of "1" and "0" set by the system as shown in Figure 4 of Applicants' drawings.

The Examiner has maintained his position based on the assertion that Applicants argued limitations which were described in the specification rather than in the claims. It is respectfully submitted, however, that the Examiner has misunderstood Applicants' arguments. Specifically, when Applicants asserted that synchronization data may include a preamble signal Pa and a synchronization pattern Syw, Applicants were not relying on the disclosed preamble signal to distinguish over Kanade as interpreted by the Examiner. Rather, Applicants were evidencing why the "genlock signal" of Kanade does not correspond to "a synchronization pattern for establishing frame synchronization" by comparing the characteristics of a "preamble signal" relative to a "synchronization pattern."

In any event, in order to expedite prosecution, claims 1, 9 and 12 have been amended to define the synchronization data for time synchronization as having at least two components: (1) a preamble signal working as a reference signal by which said child device adjusts its clock phase to that of said parent device and (2) a synchronization pattern for establishing frame synchronization. In contrast, at best, Kanade discloses only the alleged synchronization data as having just one component. As described throughout Applicants' specification, according to the claimed combination, the present invention can make it possible to perform the shooting operation while attaining mutual time synchronization by, for example, the video camera devices alone; i.e., without separately providing a device for attaining synchronization as in conventional techniques, thereby greatly improving user convenience.

As anticipation under 35 U.S.C. § 102 requires that each and every element of the claim be disclosed, either expressly or inherently (noting that "inherency may not be established by probabilities or possibilities", *Scaltech Inc. v. Retec/Tetra*, 178 F.3d 1378 (Fed. Cir. 1999)), in a single prior art reference, *Akzo N.V. v. U.S. Int'l Trade Commission*, 808 F.2d 1471 (Fed. Cir. 1986), based on the forgoing, it is submitted that the cited prior art does not anticipate the independent claims, nor any claim dependent thereon. The Examiner is directed to MPEP § 2143.03 under the section entitled "All Claim Limitations Must Be Taught or Suggested", which sets forth the applicable standard for establishing obviousness under § 103:

To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. (citing *In re Royka*, 180 USPQ 580 (CCPA 1974)).

In the instant case, the pending rejection does not "establish *prima facie* obviousness of [the] claimed invention" as recited in the independent claims because the proposed combinations fail the "all the claim limitations" standard required under § 103.

Under Federal Circuit guidelines, a dependent claim is nonobvious if the independent claim upon which it depends is allowable because all the limitations of the independent claim are contained in the dependent claims, *Hartness International Inc. v. Simplimatic Engineering Co.*, 819 F.2d at 1100, 1108 (Fed. Cir. 1987). Accordingly, as the independent claims are patentable for the reasons set forth above, it is respectfully submitted that all claims dependent thereon are also patentable. In addition, it is respectfully submitted that the dependent claims are patentable based on their own merits by adding novel and non-obvious features to the combination.

Based on the foregoing, it is respectfully submitted that all pending claims are patentable over the cited prior art. Accordingly, it is respectfully requested that the rejections under 35 U.S.C. § 102/103 be withdrawn.

CONCLUSION

Having fully responded to all matters raised in the Office Action, Applicants submit that all claims are in condition for allowance, an indication for which is respectfully solicited. If there are any outstanding issues that might be resolved by an interview or an Examiner's amendment, the Examiner is requested to call Applicants' attorney at the telephone number shown below. To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

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